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USDOC FOR 532/OEA/MNICKSON-DORSEY /LLAUCIUS
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS
SINGAPORE FOR FCS

SIPDIS

E.O. 12958: N/A
TAGS: [BMGT](#) [BEXP](#) [ETRD](#) [ETTC](#) [HK](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION:
MOS GROUP PTE LTD
REF: A) USDOC 01387 B) D377049

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Regional Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification (PSV) at MOS Group Pte Ltd., 2 Boon Leat Terrace No. 05-03, Harbourside Bldg 2, Singapore (MOS). The item in question is a hafnium metal sputter target exported to MOS on or about August 16, 2007 and valued at USD 565. The item is classified under Export Control Classification Number (ECCN) 1C231 and is controlled for nuclear non-proliferation (NP) reasons. The exporter was Bayville Chemical Supply Company of Deer Park, New York.

¶3. According to the Singapore companies registry, MOS was registered in 2004 and its registered share capital is the Singapore dollar equivalent of approximately USD 30,000. Its directors and shareholders are Singapore permanent residents Li, Wai Ping and Li, Tan Mua.

¶4. According to the company's web site, MOS's focus is manufacturing and refurbishing semiconductor equipment. It has support centers in Asia and the United States. The company states that it has over 20 years of process equipment experience and is in partnership with renowned semiconductor equipment manufacturers to offer equipment refurbishment and turn-key technology. Key products include diffusion furnaces, rapid thermal process systems, plasma ashers and chemical cleaning systems. It supplies several IC production lines in China. MOS has offices in Singapore, mainland China, Hong Kong, the United States and service centers in Malaysia, Taiwan and Thailand.

¶5. On April 21, 2008, the ECO, accompanied by a representative of Singapore Customs visited the company and met with Ms. Mavis Tai, Deputy General Manager. Ms. Tai stated that the company is primarily a trading company specialized in semiconductor equipment. It is the authorized representative of some U.S. companies and supplies a range of semiconductor manufacturing companies including STAT, SMIC and UMC. It also provides spare parts to various universities and research institutes in Singapore. The Thailand and Malaysia offices are primarily involved in equipment sales. Bayview, the exporter, is an occasional supplier.

¶6. As to the particular item in question, Ms. Tai stated that this item had been procured on behalf of the Singapore Institute of Materials Research and Engineering, a Singapore government sponsored research institute (<http://www.imre.a-star.edu.sg>). As to the end-use of the item, Ms. Tai provided an e-mail from Ms. Emily Chua of the institute stating that a Denton Sputtering Discovery 18 would be used to sputter the material on silicon wafers for materials

research. Ms. Tai also provided ECO with documentation confirming delivery of the item to the Institute.

¶7. MOS is collocated with another company, namely Prima Research and Technologies Ptd. Ltd. (Primaco). When asked about the company, Ms. Tai stated that the two companies share space and a common director but that Prima is involved in research and production related to alternative health care products sold in Asia. She provided the web address of the company as www.primaco.com. A subsequent review of that web site reveals that this company is apparently involved in a very similar business as MOS and not in health care products production. It boasts U.S. and other offices, some of which are collocated with other MOS offices. Other offices are located at separate addresses. ECO requested clarification on the nature of Primaco's business from Ms. Tai by subsequent e-mail. She responded that she would respond when returning from maternity leave. ECO will forward her response to OEA if/when it arrives.

¶8. While the information about the specific order in question and about MOS's business appeared credible, ECO is concerned that other exports apparently going to MOS customers may actually be destined for Primaco customers (or vice-versa). ECO recommends a close review of past licensed and unlicensed shipments to these two companies.